

Froelich, Stacy

From: Anderson, Jim A. (AQ)
Sent: Wednesday, August 13, 2008 11:01 AM
To: Froelich, Stacy
Subject: FW: Basin Elect ClassI/AQRV modeling protocol

Importance: High

-----Original Message-----

From: John_Notar@nps.gov [mailto:John_Notar@nps.gov]
Sent: Thursday, August 07, 2008 6:50 PM
To: Anderson, Jim A. (AQ)
Cc: Don_Shepherd@nps.gov; John_Vimont@nps.gov; John_Bunyak@nps.gov; John_Notar@nps.gov; TIM_ALLEN@FWS.GOV; Ellen_Porter@nps.gov; GOLDEN.KEVIN@epamail.epa.gov; Latimer.Douglas@epamail.epa.gov; Andrea_Stacy@nps.gov; John_Vimont@nps.gov
Subject: Basin Elect ClassI/AQRV modeling protocol
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Jim: I have completed my review of the Class I modeling protocol for the Basin Electric has submitted a Class I modeling protocol for its planned 700MW coal fired plant to be located in Selby, SD. It appears to include potential impact to Badlands NP, SD and Theodore Roosevelt NP, ND which are about 205 to 300 km from the project.

The contact person here at NPS for this project is Andrea Stacy. Her information is listed below.

Overall the protocol is satisfactory. But before we give a final approval of the protocol they should contact Don Shepherd of the NPS Air Resources Division at (303)-969-2075 regarding the proposed speciation of the particulate emissions. Don's comment is that he would like to see the actual emission rates and stack parameters prior to approving the protocol. I am especially interested, as usual, in how ENSR handles the condensable inorganics. It is my contention that condensable inorganics consists of more than just the H2SO4 (e.g., HCl and HF) and that those other components are also hygroscopic and should therefore be modeled as if they are hygroscopic sulfates.

I just have a few other comments below.

They did not mention the NPS approved Class I receptors for the 2 parks. ENSR can download them from the NPS web site, they are aware of the site and know how to get them.

Although the proposed VISCREEN analyses are just for the 4 State of South Dakota recreation areas, I have the following comment. I discussed this with the Fish and Wildlife Services meteorologist Tim Allen here in Denver and we both agree that the proposal to use the 100 meter winds from the on-site meteorological tower is incorrect. For VISCREEN they should use the 10 meter winds from the on-site meteorological tower for transport wind speed and direction. This is the normal method used for VISCREEN. The proposed use of the 10 meter winds for stability is correct.

They should report the results for acid deposition of total nitrogen and total sulfur and should address the Federal Land Managers Deposition Analysis Threshold (DATs) of 0.005 kilograms per hectare per year (kg/ha/yr) developed for the western states for both total nitrogen and sulfur.

When they submit the permit application, we want them to send Andrea or me a portable hard drive with the modeling files for CALMET, CALPUFF, POSTUTIL and CALPOST, and the meteorological data needed to create the CALMET meteorological. ENSR is aware of this procedure and know how to do this data submittal.

If you or ENSR have any questions regarding this project contact Andrea Stacy.

thanks

John Notar

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